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September 7, 2017

Kenneth Myers
East Chicago Sanitary District
5201 Indianapolis Blvd.
East Chicago, IN 46312

RE: East Chicago Sanitary District
Comments on the Local Limit Study
Issued 8/18/2017

Dear Mr. Myers:

Attached please find Safety-Kleen System, Inc.'s comments to the East Chicago Sanitary District's Local Limit Study.

If you have any questions, please feel free to contact me at 219/391-6127.

Respectfully,



Dennis M. Zawodni
Sr. Compliance Manager

Enclosure

To: East Chicago Sanitary District, 5201 Indianapolis Boulevard, East Chicago, Indiana 46312

Date: September 7, 2017

Subject: ECSD Local Limits Study Document Comments

1.0 Introduction

These comments present an assessment by Safety-Kleen Systems, Inc, 601 Riley Road, East Chicago, IN 46312 (Safety-Kleen) for the East Chicago Sanitation District's (ECSD) Local Limits Study Document (the "ECSD LL Study Document"). The specific focus of these comments are on the re-development of the local limit for cyanide (amenable) for industrial users to the ECSD Publically-Owned Treatment Works (POTW).

The re-developed limit for cyanide (amenable) is proposed to be 19 ug/L (ppb), which is an increase of 16 ppb from the existing local limit of 3 ppb. In the development of the limit, ECSD relied on the 1994 EPA's July 2014 Local Limits Development Guidance (EPA-833-R-04-002A) (the "EPA Local Limits Guidance Document"). Safety-Kleen agrees that the reliance on the Local Limits Guidance Document is appropriate for development of the local limit for cyanide (amenable). However, we have specific comments concerning the following specific assumptions and approaches used to develop the local limit for cyanide (amenable) including:

- The sampling frequencies and methods used to develop the existing loadings to the POTW;
- The removal efficiency calculations for cyanide reduction across ECSD's POTW; and,
- The allocation method utilized to develop the local limits.

In addition, the proposed local limit assumes no adjustment to the local limit if the Site-Specific Criteria Cyanide (Free) Modification Request for the West Branch of Grand Calumet River (WBGCR), currently being reviewed by IDEM and EPA, is accepted. These specific issues are discussed in greater detail in the following sections.

2.0 Specific Discussion of Comments

2.1 Sampling Data (Section 3 and Attachment C of the ECSD LL Study Document)

Based on a review of the ECSD LL Study, ECSD estimated contributions from domestic/commercial sources of cyanide (amenable) via grab sampling on seven (7) consecutive days from three pump stations for three events. The three pump stations, which are the Marktown, Magoun Avenue and Roxanna locations, were not all sampled during each event. In addition, it is unknown if the grab sampling was performed multiple times over a 24-hour period, as recommended by Section 4.5 of the EPA Local Limits Guidance Document, or as a single event only.

Given that Safety-Kleen would anticipate the cyanide (amenable) concentrations to be non-detect for the residential/commercial sources, we would like to confirm that multiple grab samples were collected (minimum of 4 is recommended) for each event. In addition, we are questioning why all three pump station locations weren't sampled for cyanide (amenable) for each of the 3 events. At a minimum, we are requesting additional information on the cyanide (amenable) events, including number of grab samples collected per 24-hour sampling event and specific reasons why all three pump stations were

not sampled at the same time. Based on the information received, we may recommend an additional sampling round of all three pump stations for seven consecutive days be conducted.

2.2 POTW Removal Efficiencies (Section 5 of the ECSD LL Study Document)

Removal efficiency is the percentage of the influent pollutant loading that is removed from the waste stream across the entire POTW process. Based on a review of the ECSD LL Study Document, ECSD estimated a POTW removal efficiency of 21% based on the mean removal efficiency (MRE) method. The 21% removal efficiency is lower than what would be expected based on a review of Appendix R of the EPA Local Limit Guidance Document, which identifies a mean removal efficiency of 69% over an activated sludge process like the ECSD POTW process. Though the MRE method is one of the three recommended methods described in the EPA Local Limits Guidance Document, ATC does not believe this method is the most appropriate given the higher anticipated removal efficiencies. As an example, samples should be collected at a time period that accounts for the hydraulic retention lag across the POTW, as recommended pursuant to Section 5.1.1. of the EPA Local Limits Guidance Document. At a minimum, Safety-Kleen recommends additional information on the sampling events and the POTW system to evaluate if the appropriate hydraulic lag time was considered. Depending on the information reviewed, we may recommend additional sampling of the POTW influent and effluent be conducted.

2.3 Local Limits Allocation Method (Section 9 of the ECSD LL Study Document)

Based on a review of the ECSD LL Study Document, ECSD assumed a uniform allocation for the proposed cyanide (amenable) limit of 19 ppb for the industrial users to the ECSD POTW. Section 6.4.2 of the EPA Local Limits Guidance Document allows the flexibility of issuing local limits as uniform concentration-based limits, contributory-based flow-based limits, or contributory-based mass-based limits. In addition, Section 6.5 of the EPA Local Limits Guidance Document recommends that local limits allocation be determined based on a "common sense determination" approach that can include the technical feasibility of treatment. Safety-Kleen is recommending that the proposed limit of 19 ppb be modified to a contributory-based mass-based local limit based on the fact that over half of the 26 outfalls of the industrial users discharging to the ECSD POTW are not anticipated to contain detectable levels of cyanide (amenable) (i.e., 10 of the 26 outfalls discharge sanitary and non-contact cooling waters, two of the 26 outfalls have no discharge, one of the 26 outfalls discharge non-contact cooling waters and stormwater, and one of the 26 outfalls discharge boiler blowdown and sanitary).

2.4 Site-Specific Criteria Modification Request

Based on a review of the ECSD Local Limits Study Document, ECSD developed the proposed local limit for cyanide (amenable) without mention of the impending Site-Specific Criteria Cyanide (Free) Modification Request for the WBGCR. The Site-Specific Criteria Cyanide (Free) Modification, when approved, could result in an adjusted monthly average limit of up to 9 ppb. At a minimum, we recommend that the ECSD Local Limit Study Document reference the Site-Specific Criteria Cyanide (Free) Modification for the WBGCR and that the local limit for cyanide (amenable) will be adjusted upon approval of the Request.

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Sent to **Kenneth Myers**

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East Chicago, Sanitary District

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